

In the Matter of)
)
Advanced Television Systems) MM Docket No. 87-268
and Their Impact upon the)
Existing Television Broadcast)
Service)

To: The Commission

WTVZ Licensee, LLC, licensee of WTVZ-TV, Norfolk, Virginia (“WTVZ-TV”), through its attorneys, hereby petitions the Commission for partial reconsideration of the *Seventh Report and Order*, FCC 07-138, adopted in the above-captioned docket on August 1, 2007 and released on August 6, 2007 (“*Seventh Report and Order*”). In the *Seventh Report and Order*, the Commission adopted a modified post-transition digital television table (“DTV Table”) of allotments and accompanying Appendix B.

¹ See Exhibit 1. The Engineering Statement does not yet include all the parameters necessary to make the requested modifications to the DTV Table for the station. However, the station intends to submit a supplement to the instant Petition as expeditiously as possible to provide that information.

urges the Commission to partially reconsider the *Seventh Report and Order* and to make the requested changes to the DTV Table.

Respectfully submitted,

WTVZ Licensee, LLC

By: /s/

Kathryn R. Schmeltzer

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Its Counsel

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Dated: October 26, 2007

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EXHIBIT 1

CARL T. JONES
CORPORATION

**STATEMENT OF JOHN E. HIDLE, JR.
IN SUPPORT OF A
PETITION FOR PARTIAL RECONSIDERATION
OF THE DTV TABLE OF ALLOTMENTS
WTVZ-DT - NORFOLK, VIRGINIA
DTV - CH. 38, 590 kW, ERP; 360.5 M HAAT**

Prepared for: WTVZ LICENSEE, LLC

I am an Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

GENERAL

WTVZ Licensee, LLC licensee of WTVZ-TV, Channel 33, Norfolk, Virginia, and permittee of the paired Digital Television Allotment for WTVZ-DT, Channel 38, has authorized this office to prepare this statement, and associated exhibits as part of a Petition For Partial Reconsideration of the DTV Table of Allotments. It is requested herein to correct the FCC antenna identification number to reflect the correct pattern for the WTVZ-DT facility on its post-transition channel, and to adjust the effective radiated power based upon an appropriate interference analysis utilizing the corrected antenna pattern.

TECHNICAL FACILITY AS REFLECTED IN THE DTV TABLE OF ALLOTMENTS

The Seventh Report and Order and Eighth Further NPRM (MB Docket 87-268) includes the recently adopted DTV Table of Allotments, that identifies the specific technical facilities at which the Commission has proposed to allow DTV stations to operate after the DTV transition. The facilities included in the DTV Table of Allotments are those for which broadcasters were required by the Commission to certify a specific coverage area based upon their ability to "build out" to the level of checklist or maximized facilities as reflected in their FCC authorizations. WTVZ Licensee, LLC understands its obligations under the Commission's policy that broadcasters' final facilities must cover their certified coverage area as approved by the Commission. Further, the permittee of WTVZ-DT wishes to avoid loss of any current coverage area of either its digital or analog facilities based on the inclusion of an incorrect antenna pattern or ERP in the DTV Table of Allotments.

WTVZ-DT, Norfolk, Virginia has a license to operate on Channel 38 at 590 kW ERP, 360.5 m HAAT on a directional transmitting antenna. However, WTVZ-DT has selected its analog Channel 33 to be utilized by its ultimate post-transition facility. The Seventh Further Notice shows WTVZ-DT as authorized to operate at 905 kW ERP at 361.0 m HAAT on Channel 33, utilizing a directional pattern indicated as FCC Antenna Identification Number 74538, which is a theoretical pattern created by the Commission based upon dipole factor calculations. The license of the current analog facility of WTVZ-

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TV erroneously includes the use of directional antenna pattern, FCC Antenna Identification Number 58983, which refers to the specifications of a Dielectric Model TFU-30JTH-R O4, that is a Non-Directional antenna. This FCC Antenna ID Number is indicated contrary to the Commission's policy of leaving the antenna ID portion of the CDBS record blank for Non-Directional antennas. The licensee of WTVZ-DT believes that on the statutory date of the DTV transition, it would be best to immediately switch to digital use of the antenna currently utilized by its analog facility, as this will be least likely to result in a potentially lengthy disruption of television service to the public which would be caused if the existing antenna were removed from the tower so that a new antenna could be installed. Therefore, it is erroneous for the DTV Table of Allotments to reflect the use of FCC Antenna Identification Number 74538 by WTVZ-DT on Channel 33, or any other directional antenna for that matter. Instead, the Table should reflect the use of Non-Directional antenna, because a Non-Directional antenna is the actual antenna in use by the currently licensed analog facility of WTVZ-TV, currently operating on Channel 33, rather than the directional pattern of an antenna that does not currently exist, or a theoretical pattern based upon dipole factor calculations.

Therefore, the petitioner seeks leave to file a supplemental technical statement to request an appropriate adjustment to the effective radiated power reflected in the DTV Table of Allotments based upon further study of the facility based on use of the appropriate Non-Directional antenna, and considering other factors relevant to DTV coverage areas

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and analysis of interference to other stations.

SUMMARY

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

Dated: October 26, 2007



John E. Hidle, Jr.